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Frank S. Simone  
Government Affairs Director

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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March 27, 2000

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S. W. - Room TWB-204  
Washington, D. C. 20554

Re: Ex parte, CC Docket No. 00-4, Application by SBC Communications Inc.,  
Southwestern Bell Telephone Company, and Southwestern Bell Communications  
Services, Inc. d/b/a Southwestern Bell Long Distance for Provision of In-Region  
InterLATA Services in Texas

Dear Ms. Salas:

On Friday, March 24, 2000, Geraldine Mack, Sarah DeYoung and the undersigned, all of AT&T, met via telephone with Jessica Rosenworcel of the Common Carrier Bureau's Policy and Program Planning Division. The purpose of the meeting was to clarify the reporting level specified for Texas performance measurement 59 for 8 db unbundled loops, Percent Trouble Reports within 30 days of Installation, also known as the I-30 Report. AT&T indicated that while the business rule documentation for 8 db unbundled loops specifies that performance is reported at the order level, SWBT has confirmed to AT&T that in fact this measurement is reported at the circuit level.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206 (b) of the Commission's rules.

Sincerely,

ATTACHMENTS

cc: J. Rosenworcel

No. of Copies rec'd 0+2  
List A B C D E

<b>59. Measurement</b>	
<b>Percent Installation Reports (Trouble Reports) Within 30 Days (I-30) of Installation</b>	
<b>Definition:</b>	
Percentage of UNEs (8db loops are measured at an order level) that receive a network customer trouble report within 30 calendar days of service order completion.	
<b>Exclusions:</b>	
<ul style="list-style-type: none"> <li>• Specials and Interconnection Trunks.</li> <li>• Excludes Non-measured reports (CPE, Interexchange, and Information reports).</li> <li>• Excludes UNE Combos captured in the POTS or Specials measurements.</li> <li>• Excludes trouble report received on the due date before service order completion.</li> <li>• Excludes orders that are not N, T, or C.</li> </ul>	
<b>Business Rules:</b>	
A trouble report is counted if it is received within 30 days of a service order completion. The service order which generated the report must be an add in order for the trouble report to be counted. UNEs are selected based on a specific service code off of the circuit ID. This measurement is reported at a circuit level for all UNEs with the exception of 8db loops, which are reported at an order level to facilitate comparison with POTS retail.	
<b>Levels of Disaggregation:</b>	
UNEs contained in the UNE price schedule, and/or agreed to by parties.	
<b>Calculation:</b>	<b>Report Structure:</b>
(Count of UNEs (8db loops are measured at an order level) that receive a network customer trouble report within 30 calendar days of service order completion ÷ total UNEs (total orders for 8db loops) ) * 100	Reported for CLEC and all CLECs.
<b>Measurement Type:</b>	
Tier 1 – High Tier 2 – High	
<b>Benchmark:</b>	
See Measurement 58	

-----Original Message-----

From: HUSER, RHONDA (SWBT) [mailto:rh4891@txmail.sbc.com]

<mailto:[mailto:rh4891@txmail.sbc.com]>

Sent: Wednesday, December 15, 1999 4:57 AM

To: Yee, Grace, NCAM

Subject: TCG Discrepancy Matrix

<<TCG Performance Measurement Discrepanices 11-22.doc>> Grace:  
Please find enclosed the TCG Discrepancy Matrix with SWBT responses. There  
are a couple issues still under investigation and as soon as I receive those  
answers I will forward them to you.

<<TCG Performance Measurement Discrepanices 11-22.doc>>

Thanks and Happy Holidays.

Rhonda Huser

AT&T Local Account Manager

Work: 214-464-1393

Pager: 1-888-262-4106

Fax: 214-858-0281

**Performance Measurement Discrepancies**  
**AT&T/TCG**  
**7/99 – 9/99**

Issue #	PM #	Data Mo.	Description of Discrepancy/Issue	SWBT RESPONSE	AT&T RESPONSE	STATUS (OPEN OR CLOSED ISSUE)
			10/99	service order number is N050399HO. The circuit ID's are 28/HRCT/000006 /SW and 28/HRCT/000007 /SW. This order was processed to change the ACNA on two existing DS1s that were originally ordered on 2/20/98.		
18	Measure 58 vs. 59 vs. 60 vs. 63	7/99 – 9/99	<p>Measure 58, 60 and 63 report 2 8db orders for Dallas, but Measure 59 shows 0.</p> <p>Discrepancies noted in September data between measures 58, 59, 60 and 63, as well as questions about base of orders for Measure 59.</p> <p>Also, see new issue opened below regarding level of performance for Measure 59.</p>	<p>The 8db data for measure 59 has not been available to date. Beginning with September results, the data collection will include 8db loop results.</p> <p><b>SWBT reports 8db loops at the order level for PMs 58, 60, and 63 which is in parity for POTS the service of comparison. SWBT reports 5db loops at the circuit level for the same measures which is parity with VGPL the retail comparison. For PM 59 the results are reported at the circuit level for both 8db and 5db loops. The logic behind the item level issue on measure 59 is that both</b></p>	<p>September report includes data for PM 59, but it raises further questions. For 5 dB loops, the reported data show the same denominator across measures 58, 59, 60, and 63 (number of circuits, e.g., July 1999, SWBT reports provisioning 149 5.0 dB circuits for TCG in Houston under all 4 measures). However, for 8 dB loops, SWBT reports provisioning a total of 117 orders in Houston (111 no field work, 6 field work) under PM 58, 60, and 63, but a total of 299 orders under PM 59. A similar discrepancy exists for Dallas/Fort Worth. AT&amp;T does not understand why the total number of units</p>	<p>Open. The one month of data reported shows apparent discrepancies, and three months of data are lacking.</p>

**Performance Measurement Discrepancies**  
**AT&T/TCG**  
7/99 – 9/99

Issue #	PM #	Data Mo.	Description of Discrepancy/Issue	SWBT RESPONSE	AT&T RESPONSE	STATUS (OPEN OR CLOSED ISSUE)
				<p>types of services, 8db and 5db, can contain multiple stand alone circuits. Because of these stand-alone circuits, these require an item level report to identify the trouble reports on each individual circuit.</p> <p>I-30 reports are reflected in the month that the trouble ticket is closed. The same holds true for the retail comparison.</p>	<p>(whether orders or circuits) should be consistent across all 4 measures for 5 dB loops, but inconsistent in the case of PM 59 for 8 dB loops.</p> <p>It also is unclear how SWBT could be capturing all the relevant trouble reports under PM 59, if that PM is based on the number of orders provisioned during the month covered by the report. For example, if the reported data for September 1999 is based on orders completed during September 1999 (which is what would be indicated by consistency among 58, 59, 60, and 63), then, for orders received in the latter part of the month, the data can only reflect trouble reports received within the first few days after installation, not within 30 days.</p> <p>In addition, SWBT has reported only one month of 8 dB loop data in the</p>	